

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
IN ADMIRALTY**

CASE NO. 2:21-cv-965-RMG

**TIFFANY N. PROVENCE, as the Personal
Representative of the Estate of Juan
Antonio Villalobos Hernandez,**

Plaintiff,

v.

**UNITED STATES OF AMERICA,
CROWLEY MARITIME
CORPORATION, CROWLEY
GOVERNMENT SERVICES, INC.,
DETYENS SHIPYARDS, INC., and
HIGHTRAK STAFFING, INC. d/b/a
HITRAK STAFFING, INC.**

Defendants.

**CONSENT MOTION TO AMEND
SCHEDULING ORDER**

Plaintiff Tiffany N. Provence, as the Personal Representative of the Estate of Juan Antonio Villalobos Hernandez (“Plaintiff”), by and through her undersigned counsel, and with the consent of Defendants, hereby moves pursuant to Local Rule 6.01 and Fed. R. Civ. P. 16(b)(4) for the entry of a Consent Amended Scheduling Order in the form attached as Exhibit A.

In support of this request, the parties state as follows:

1. The Court entered a Scheduling Order dated May 20, 2021. (Dkt. No. 15).
2. In their Rule 26(f) conference, the parties agreed to an amended schedule and the Court entered an Amended Scheduling Order on July 13, 2021. (Dkt. No. 25).
3. The parties have exchanged written discovery requests.

4. Plaintiff expects to notice the depositions of at least 25 fact witnesses. To date, Plaintiff has requested to depose 15 fact witnesses and the parties are working to secure dates for these depositions.

5. Plaintiff has issued subpoenas to nine third parties and anticipates voluminous document productions in response.

6. Accordingly, the parties request an extension of time to complete discovery, identify experts, and prepare for trial. Specifically, the parties request a four-month extension of all upcoming deadlines within the Scheduling Order (Dkt. No. 25). The extension is necessary to ensure that the parties can complete written discovery and the depositions of expert and fact witnesses.

7. A four-month extension of all upcoming deadlines would affect the deadlines for dispositive motions and *Daubert* motions, as well as deadlines for motions *in limine*, pretrial disclosures, and pretrial briefs.

8. Pursuant to Local Civil Rules 6.01 and 7.02, the parties request that the Court modify the Amended Scheduling Order as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Plaintiff's Expert Witnesses	October 17, 2021	February 17, 2022
Defendants' Expert Witnesses	December 18, 2021	April 18, 2022
Records Custodian Witnesses	January 25, 2022	May 25, 2022
Completion of Discovery	February 16, 2022	June 16, 2022
Dispositive Motions	March 1, 2022	July 1, 2022
Mediation	March 16, 2022	July 16, 2022
Trial	June 1, 2022	October 1, 2022

WE SO MOVE:

s/ Julie L. Moore

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Julie L. Moore (Fed. Bar No. 11138)

Robert Wehrman (Fed. Bar No. 13426)

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WE CONSENT:

s/ Ryan Daniel Gilsenan

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September 17, 2021

Charleston, South Carolina